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### ***REMARKS/ARGUMENTS***

Reconsideration of this application is respectfully requested.

#### ***Claim Rejections***

Claim 40 was objected to because of the recitation "can be". Claim 40 is amended to eliminate the phrase and the objection is traversed.

Claim 80 was objected to because of a typographical error in which "analysts" should have read -- analyst --. Claim 80 is amended accordingly and the objection is traversed.

#### ***Claim Rejections – 35 U.S.C. § 112***

The Office Action rejected claim 36 under 35 U.S.C. § 112, first paragraph for being a "single means" claim. Claim 36 is amended to positively claim facilities enabling parallel design analysis and the rejection is traversed. Claims 37-40 and 78-80 were rejected because they depended on claim 36. In view of the amendment to claim 36, the rejection of claims 37-40 and 78-80 is likewise traversed.

The Office Action rejected claims 78 and 81 under 35 U.S.C. § 112, second paragraph as being indefinite because "multi-user extensions" is not clearly described in claim 81 and in the specification. Applicant respectfully disagrees that "multi-user extensions" are not clearly described in the specification.

Claim 78 is cancelled and the rejection of claim 78 is thereby traversed. With respect to claim 81, claim 81 is amended to claim that the method uses multi-user extensions to provide facilities enabling parallel design analysis of the image-mosaics by a plurality of engineer analysts concurrently reverse engineering an integrated IC, including: annotation ownership tracking; unique annotation label generation; annotation locking; and, annotation merging, as described in the specification. The rejection of claim 81 and claims 82-87 which depend therefrom is thereby traversed.

#### ***Claim Rejections – 35 U.S.C. § 102***

The Office Action rejected claims 36-37, 78 and 81-82 under 35 U.S.C. § 102(e) as being anticipated by Skoll et al. Applicant respectfully disagrees. The applied reference has a common inventor and the claimed subject matter was commonly owned at the date of invention.

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The effective filing date of Skoll et al. is July 25, 2000 while the effective filing date of the instant application is October 18, 2000.

In any event, Skoll et al. teach a predictive caching algorithm used to efficiently deliver images to an analysis workstation by caching tile image constituents of image-mosaics to enable a smooth, real-time display of portions of the image mosaic during panning, resizing or zooming of the view. Contrary to the position taken by the Office Action, Skoll et al. neither teach nor suggest concurrent analysis by a plurality of engineer analysts. Skoll addresses only the problem of image caching to permit smooth transition between one of more views displayed on an engineer analysts workstation 220. Although Skoll et al. teach that it is an object of their invention to enable extraction of design and layout information via multiple workstations, Skoll et al. neither teach nor suggest that the multiple workstations are used concurrently to analyze the same integrated circuit. In addition, amended claims 36 and 81 claim facilities for annotation ownership tracking, unique annotation label generation, annotation locking and annotation merging, none of which are taught or suggested by Skoll et al.

Claim 78 is cancelled, and the rejection of claims 36 and 81 is traversed.

With respect to claims 37 and 82, column 3, line 23 of Skoll et al. teaches extraction of design and layout information via multiple workstations but does not teach concurrent annotation, nor suggest it. The rejection of claims 37 and 82 is thereby traversed.

The Office Action rejected claims 36-37, 78 and 81-82 under 35 U.S.C. 102(b) as being anticipated by Lam et al. Applicant respectfully disagrees. Lam et al. teach an automated design analysis system. In the background of the invention they described a manual process performed sequentially by engineers. In any event, Lam et al. neither teach nor suggest the features claimed in amended claims 36 and 81. The rejection of claims 36-37 and 81-82 is thereby traversed.

With respect to claims 37 and 82, Figs. 1-3 of Lam et al. do not support a plurality of image mosaics annotated concurrently. As shown in Fig. 1d, a single analyst is connected directly to a single computer and performs image analysis in an isolated way, as was known in the prior art. The rejection of claims 37 and 82 is thereby traversed.

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***Claim Rejections – 35 U.S.C. § 103***

The Office Action rejected claims 38-40, 80 and 83-87 under 35 U.S.C. 103(a) as being unpatentable over Lam et al. in view of Trinchieri. Trinchieri teaches an apparatus for detecting when the activity of one process in relation to a common piece of information interferes with any other process in a multiprogramming/multiprocessing computer system. Applicant respectfully submits that Trinchieri is not analogous art.

The Office Action asserts that Lam discloses substantially all the elements of claims 38-80 except one user/designer/engineer/analyst at a time and a lock feature. For reasons set forth above, Applicant disagrees. In any event, no combination Lam et al. and Trinchieri teaches or suggests the innovated features claimed in amended claims 36 and 81 and the rejection of claims 38-40, 80 and 83-87 is traversed.

The Office Action rejects claims 36-40 and 78-87 under 35 U.S.C. 103(a) as being unpatentable over Phaneuf et al. in view of Ernst. The rejection is not understood.

Phaneuf teaches an automated analysis system using focused ion beam (FIB) imaging and a mass spectrometer to deconstruct an integrated circuit in a single automated process. Engineer analysts are not involved. The traditional analysis of circuit design is discussed in the background of the invention. However, Phaneuf neither teaches nor suggests any of the facilities claimed in amended claims 36 and 81. The rejection of those claims is thereby traversed. With respect to Ernst, Ernst teaches a project management system and method which does not constitute analogous art. In any event, no combination of Phaneuf and Ernst teach or suggest the inventive features claimed in amended claims 36 and 81 and the rejection of claims 36 and 81 is traversed.

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In view of the amendment of claims 36-40, the cancellation of claim 78 and amendment of claims 79-81, the cancellation of claim 82 and the amendment of claims 83-87, claims 36-40 and 79-81 and 83-87 that remain pending in this application are considered to be in a condition for immediate allowance. Favourable reconsideration and early issuance of a Notice Allowance are requested.

Respectfully submitted,

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